EXHIBIT 2

```
UNITED STATES DISTRICT COURT
   SOUTHERN DISTRICT OF NEW YORK
SHABTAI SCOTT
                         · ) Case No. 18-Civ. 12355
personal representative · CONFIDENTIAL of the Estate of Keren · ) VIRTUAL VIDEOTAPED Shatsky, J ANNE · DEPOSITION OF NADIA SHATSKY, individually · GHANNAM and as personal ·
individually and as ·
and as personal ·
representative of the .
Estate of Keren ·
Shatsky, TZIPPORA ·
SHATSKY SCHWARZ, YOSEPH ·
SHATSKY, SARA SHATSKY ·
TZIMMERMAN, MIRIAM:
SHATSKY, DAVID RAPHAEL: )
SHATSKY, GINETTE LANDO ·
THALER, individually.
                              )
and as personal ·
representative of the .
Estate of Rachel · ·
Thaler, LEOR THALER,
ZVI THALER, ISAAC
THALER, HILLEL .
TRATTNER, RONIT .
TRATTNER, ARON S..
TRATTNER, SHELLEY .
TRATTNER, EFRAT.
TRATTNER, HADASSA.
DINER, YAEL HILLMAN, ·
STEVEN BRAUN, CHANA ·
FRIEDMAN, ILAN ·
FRIEDMAN, MIRIAM ·
FRIEDMAN, YEHIEL:
FRIEDMAN, ZVI FRIEDMAN, ·
and BELLA FRIEDMAN, ·
```

Case 1:04-cv-00397-GBD-RLE Document 1059-2 Filed 03/25/22 Page 3 of 69 Nadia Ghannam: Confidential Pursuant to Protective Order July 23, 2021

```
1.
                                    )
      THE PALESTINE .
      LIBERATION ORGANIZATION .
      and THE PALESTINIAN .
      AUTHORITY (a/k/a "The ...
      Palestinian Interim .
      Self-Government ·
      Authority" and/or "The .
      Palestinian National ·
      Authority"), ·
 6.
 7 .
 8
 9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
```

VIDEOTAPED DEPOSITION OF NADIA

GHANNAM, witness herein, called by the Plaintiffs, for examination, taken pursuant to the Federal Rules of Civil Procedure, by and before Karen A. Nickel, a Certified Realtime Reporter and a notary public in and for the Commonwealth of Pennsylvania, held remotely with all parties appearing from their respective locations, on Friday, July 23, 2021,

10 · at 9:30 a.m.

11 · COUNSEL PRESENT:

For the Plaintiffs:

Ronald F. Wick, Esq. (Admitted Pro Hae Vice)

Cohen & Gresser, LLP

14 2001 Pennsylvania Avenue, NW

Suite 300

15 · Washington, DC 20006

16 Stephen M. Sinaiko, Esq.

Cohen & Gresser, LLP

17 800 Third Avenue

New York, NY 10022

For the Defendants:

19 Mitchell R. Berger, Esq.

Joseph Alonzo, Esq.

20 · Salim Kaddoura, Esq.

Squire Patton Boggs

21 · 2550 M Street NW

Washington, DC 20037

Also Cosette Vincent

23 · Vincze

24

22

18

25

```
1 .
                                 INDEX
 2
         WITNESS .
                                                         PAGE
 3
         Nadia Ghannam
                   Mr. Sinaiko ·
 5
 6
                               EXHIBITS
 7
 8.
         NUMBER ·
                          DESCRIPTION ·
                                                         PAGE
 9.
         Exhibit 1.
                                   of Deposition ·
         Exhibit 2.
                                     Profile ·
                                                           29
         Exhibit 3.
                                    Personnel List .
10 .
          Exhibit 4.
                                                           71
11.
                                                           81
          Exhibit 5.
                                      Log·
          Exhibit 6.
          Exhibit 7.
12 .
          Exhibit 8.
13 .
          Exhibit 9.
          Exhibit 10 ·
                          Tweet ·
14 .
          Exhibit 11 ·
                          Tweet ·
          Exhibit 12 ·
                          Tweet ·
          Exhibit 13 ·
15.
                          Tweet ·
          Exhibit 14 ·
                          Tweet ·
          Exhibit 15.
16.
                          Tweet ·
          Exhibit 16.
                          Tweet ·
17 .
          Exhibit 17.
                          Tweet ·
          Exhibit 18 ·
                          Tweet ·
          Exhibit 19.
18 .
                          Tweet ·
          Exhibit 20 ·
                          Tweet ·
19 .
          Exhibit 21 ·
                          Tweet ·
          Exhibit 22 ·
                          Tweet ·
20 .
          Exhibit 23.
                          Tweet ·
21
22
23
24
25
```

THESE PAGES HAVE BEEN INTENTIONALLY OMITTED

No. And what was your title when you moved to the Observer Mission? My new title and new position was the advisor on media affairs. Advisor on media affairs, And is that the title that you currently hold at the Observer Mission? Yes. And have you held that title at all times since January 4 of 2020? Yes. So in your role as advisor on media affairs at the Observer Mission -- let me withdraw that. is the purpose of the media affairs function at the Observer Mission? The purpose is to elevate the work of Palestine as mandated through our work at the United Nations. To elevate the work in what respect? Through the use of various media outlets and platforms. And what is the purpose of elevating the work of the Observer Mission?

10 .

11 .

12.

13 .

14 .

15 .

16.

17 .

18 .

19.

20 .

21 .

22.

23 .

24 .

25 .

8.

10 .

11 .

12.

13 .

14 .

15 ·

16.

17 .

18 .

19.

20 .

21 .

22 .

23 .

24 .

25 .

To enhance and, basically, project the work of the United Nations in hopes of accomplishing their mandate of seeing a just resolution to the Palestine question. And when you say promoting, you know, when you say promoting, who do you -promoting to who? To the international community and to whoever chooses to sign in, listen to whatever the mandate that the UN has. So that would include, for example, the American public? Objection, first of all, she didn't use the word "promoting" and you have loaded up the question with that. So I object to the form of the question as misstating her prior testimony, but you may answer. THE It includes anybody in the international community that would like to voluntarily log in to our various media platforms that are tied to the UN mandate. if the American public is -- are people that want to chime in, they are more

than welcome to. BY MR. SINAIKO: 3. Would it be fair to say that the 4 . the purpose of media affairs is to purpose get the broadest possible attention to the work of the Observer Mission? 7. I think it would be fair to say that the purpose of the media is to bring as much attention to the plight of the illegal 10 . occupation of the Palestinian people as mandated through our work with the United 11 . 12. Nations. So is there, in your view, a 13 . 14 . material difference between the role you play 15 . at the Observer Mission today and the role you 16. previously played when you worked at the Palestinian Diplomatic Mission to the United 17 . 18 . States? 19. Absolutely, yes. And what is the difference? 20 . 21 . When I worked at the UN Mission to 22 . the U.S., I worked as a public relations and 23 . outreach advisor -- well, a director, I should 24 . say, and now that I am employed at the UN 25 . Mission of the Permanent Observer State of

THESE PAGES HAVE BEEN INTENTIONALLY OMITTED

Correct. Anywhere in the world? Yes. So anyone, any person in the United States with access to the Internet and a Facebook account would be able to see those posts; correct? 8. I have never changed the privacy setting since I started working there. Now, this -- you probably 10 . 11 . know this better than I do because you are the 12 . media affairs person; is it possible to create similar restrictions with respect to a Twitter 13 . 14 . account? I don't 15 . That is a good 16. think so. 17 . So, to your knowledge --18 . No. To your knowledge, any person with 19. 20 . access to Twitter can see anything that the Observer Mission posts on its Twitter account? 21 . 22. Yes. 23 . So as far as you know, the 24 . information that you post to the Observer 25 · Mission's Twitter account goes to the public at

large; correct? Yes. Would it be fair to say that you regard it as important that the Observer Mission's Facebook and Twitter account postings get the broadest possible distribution? Yes. 8. And the Twitter and Facebook account postings that you make to the accounts that are maintained by the Observer Mission, are those 10 . 11 . accounts -- are those postings ever in a 12. language other than English? 13 . Yes. How frequently are there postings 14 . 15 . that are not in the English language? Very, very, very infrequently. 16. 17 . Very infrequently? 18 . Correct. 19. So would you say that in excess of 20 . 90 percent of the postings on the Observer 21 . Mission's Facebook and Twitter accounts are in 22 . the English language? 23 . If not more, yes. 24 . And, again, this will be a 25 . question I'm asking you because you probably

know this stuff better than I do being the media affairs person; what is the function of a hashtag on a Twitter post or a Facebook post? 4 . So that people can follow it in the search engine. 6. When you say so people can follow it in a search engine, what do you mean exactly? 8. So, for example, in Twitter, there are certain things that are trending, things trend, that's how you know what's popular. 10 . 11. for example, recently, one of 12. the hashtags I have been using is 13 . SaveSheikhJarrah, it's a hashtag, is the 14 . illegal move by settlers or whatever to remove 15 . people who have lived in this neighborhood for 16. decades. 17 . it's So people -- if 18 . you put in the hashtag, #SaveSheikhJarrah, you 19. can then begin to see who is tweeting any 20 . information under that specific hashtag. 21 . So would it be fair to say, then, 22 . that using the hashtag SaveSheikhJarrah is a means of getting attention to Twitter or 23 . 24 . Facebook posts that are on the Observer Mission 25 . account and that relate to that topic?

.. Yes.

10 .

11 .

12 .

13 .

14 .

15.

16.

17 .

18 .

19.

20 .

21 .

22 .

 $23 \cdot$

24 .

25 .

And would it be fair to say that the use of hashtags, again, I'll just restrict it for the moment to the SaveSheikhJarrah hashtag, that the use of that hashtag enhances the ability of the Mission to disseminate its message around activities related to Sheikh Jarrah?

If you are a Twitter user and you know how to use Twitter, you would know that hashtags are the only way that your message is going to get disseminated

Otherwise, it just falls to the fray.

· So would it be fair to say that the very purpose of putting hashtags on these messages or these Twitter postings and Facebook postings is to ensure that your -- that the postings reach the broadest possible audience?

... And it's your intention, by using hashtags, to ensure that the postings on the Observer Mission's Twitter and Facebook feeds reach the broadest possible audience; correct?

Correct.

Not Sometimes I hashtag

information that isn't necessarily going to get a wide, broad audience, but it's the ethical and the right thing to do based on the UN mandate.

might be, for example,

Resolution 2334, that is not a hashtag you are ever going to find However, because I like to educate the public and that's one of the mandates of the UN is to educate, I will hashtag 2334 in hopes that maybe one person might get educated and that's enough for me.

So it really varies, the strategy varies every single So it's not necessarily a means to get the word out to as many people as possible.

.. So to take the SaveSheikhJarrah hashtag for just a moment, I think you said you use that one; right?

.. That is correct.

10 .

11 .

12 .

13 .

14 .

15.

16.

17 .

18 .

19.

20 .

21 .

22 .

23 .

24 .

25 .

... And the use of the SaveSheikhJarrah hashtag, the purpose of that is to ensure the widest possible dissemination of the message that the Observer Mission is disseminating in its Facebook and Twitter posts on that topic; correct?

1. Yes, although I don't use hashtags as frequently on Facebook. I do do it just for an aesthetic It looks people who follow both platforms, sometimes they link onto Twitter and Facebook, but hashtags are more so used for Twitter. 7. So, again, the purpose, then, restricting it to Twitter for a moment, the use of the SaveSheikhJarrah hashtag on Twitter, the 10 . purpose of using that hashtag is to ensure the 11 . broadest possible dissemination of the messages 12. on that topic that the Observer Mission, you 13 . know, posts to its Twitter account? 14 . Yes. 15 . And in the instance of SaveSheikhJarrah, just to take that as an 16. 17 . example, the message that the Observer Mission disseminates through its Twitter and Facebook 18 . 19. feeds is that activity relating to Sheikh 20 . Jarrah is illegal; correct? 21 . The UN has circulated many 22 . documents, articles, so forth, stating what is $23 \cdot$ happening in Sheikh Jarrah is illegal and it is 24 . against UN human rights policies, international 25 . law, international human rights laws, various

UN resolutions, and it's illegal in nature. yes, therefore, it was in the framework of my work to disseminate information within the context of the United Nations. 5. And disseminating the view of the Observer Mission that activity relating to Sheikh Jarrah is illegal is an important part of your work at the Observer Mission; correct? Yes, because part of my work is to 10 . 11 . elevate the messaging of the United Nations. 12. That's part of my work as the media advisor. 13 . Well, let me ask Isn't it to elevate the work of the 14 . 15 . In the United Nations because it's not just the Permanent Observer Mission of the 16. 17 . State of Palestine that ties onto these 18 . There are many countries that are 19. in I mean, many. 20 . mean, if you log onto Security 21 . Council meetings, you can hear Ireland, you can 22 . hear Norway, you can hear many of these countries who take the We're not even --23 . we can't even be a permanent representative in 24 . the Security Council so many countries speak on 25 .

the illegal occupation of the State of It's not just our mandate. 3. I didn't mean to T'm so I think I might have cut you off inadvertently. 6. That's okay. 7. Your Twitter posts -- not your Twitter posts, the Twitter posts that go on the Observer Mission's Twitter and Facebook feeds, 10 . those are the messaging of the Observer Mission 11 . and not of the United Nations and not of any 12. other -- any Member State or any other member 13 . organization; correct? That is correct. 14 . 15 . When you post to well, let 16. me ask On and after January 4, 2020, I think we have established that you are the only 17 . 18 . person who has posted to the Observer Mission's Twitter and Facebook accounts; correct? 19. 20 . Correct. 21 . And on and after January 4, 2020, 22 . have you made posts to those two social media 23 . accounts, that is, the Facebook account and the 24 . Twitter account, from the Observer Mission 25 . building at 115 East 65th Street in Manhattan?

Since January 4? Since January 4 of 2020, that is 3 . correct. Yes, I have. And how many times would you say, just ballpark, on and after January 4, 2020, you have posted to the Twitter account or the Facebook account of the Observer Mission from the Observer Mission building at 115 East 65th 10 . Street in Manhattan? 11 . To take a guess, February, Twitter, 12. maybe 60 Facebook, maybe 15 times. 13 . Maybe a dozen times. And the reason that that number is 14 . 15 . in the range you just mentioned is because of 16. the pandemic; correct? 17 . That is correct. And subsequent to, on or subsequent 18 . 19. to January 4, 2020, how many times would you 20 . say you have posted or you have made a post to the Observer Mission's Facebook account? 21 . 22. After January 4 -- excuse me, 2020? 23 . On and after January 4 of 2020. 24 . God, I mean, I don't 25 . I just don't That's just a very

```
I don't
        specific
                                           Maybe once a
               Do the I don't
                                           Once a week
        since January 2020, on average.
 4 .
                   So you use Facebook oh, sorry.
        Didn't mean to interrupt.
 6.
                               I can't do the math in
                   It's
        my head for I don't know.
 8.
                   Would it be fair to say that you
        post to the Observer Mission's Facebook account
10 .
        less than you post to the Observer Mission's
11 .
        Twitter account?
12 .
                   Yes.
13 .
                          On and after January 4 of
14 .
        2020, how many times would you say that you
15 .
        have posted to the Observer Mission's Twitter
16.
        account from the building at 115 East 65th
17 .
        Street?
18 .
                   From the building, like I said,
19.
        probably around 60 I'm just averaging
20 .
        once a day.
21 .
                          And putting aside -- you
22 .
        know, putting aside from the building, you
23 .
        know, from the building at 115 East 65th
24 .
        Street, how many times would you say, in total,
25 .
        you have posted to the Observer Mission's
```

```
Twitter account on or after January 4, 2020?
                    I couldn't even
        even be able to give you a
                                                A lot.
                   But it's a large number; right?
                   Yes.
                   And are you aware, I don't know,
        I'll ask, are you aware of the location of the
        servers where the Facebook and Twitter accounts
        maintained by the Observer Mission reside, you
10 .
        know, the Twitter and Facebook --
11 .
                   Servers?
12.
                   Yeah.
13 .
                   No.
14 .
                           Have you ever posted -- well,
15 .
        withdrawn.
                       and after January 4, 2020, have
16.
17 .
        you ever posted to the Observer Mission's
18 .
        Facebook account other than from within the
19.
        territory of the United States?
20 .
                    I have only posted in the United
21 .
        States.
22.
                           And with respect to the
23 .
        Observer Mission Twitter account, on and after
24 .
        January 4, 2020, have you ever posted to the
25 .
        Twitter account other than from the -- you
```

know, within the territory of the United States? 3. I have only posted in the United States. 5. On and after January 4, 2020, have you left the territory of the United States? 8. No. 9. And on and after -- I think I 10 . know the answer to this already because we may 11. have covered it, and I apologize if I'm asking 12 . again, I'm just trying to keep all the On and 13 . questions together in the 14 . after January 4, 2020, has anybody other than 15 . you made a post to either the Observer Mission 16. Facebook account or the Observer Mission 17 . Twitter account? 18 . No. 19. MR. SINAIKO: So T 20 . would ask Cosette to put up on the screen for our next exhibit, which I think is going to be 21 . 22 . No. 6, all right, I would ask Cosette to put up 23 . Tab 19. 24 . (Deposition Exhibit No. 6 was 25 . marked for identification.)

BY MR. SINAIKO: Ms. Ghannam, do you see the We're marking this as Exhibit 6. Is it It is 6. marking as Exhibit 6 the document that I just put up on the screen. Can you see it in front of you? Yes. 8. And do you recognize that to be a tweet that you posted to the Observer Mission's 10 . Twitter account? 11 . Yes, I would have written But 12 . I'm just reading it. 13 . Oh, Take your If you 14 . want to read the -- any document you want to 15 . read, feel free, just let us know that you want 16. to read it and we'll turn the You 17 . should do whatever you think you need to. 18 . It's I just want to read the tweet real Okay, yes. 19. 20 . And let me ask a And 21 . again, I apologize if this question betrays a 22 . little bit of lack of knowledge on my part. 23 . was this a retweet of a tweet 24 . that had originally been posted by the PLO's 25 . Department of Public Diplomacy and Policy?

```
1.
                    Yes.
                         MR. SINAIKO: And Cosette, can
        we just turn the page here?
        BY MR. SINAIKO:
 5.
                    This document that is now on the
        screen in front of you, it's another page of
        Exhibit 6, is this the tweet that was reposted?
 8.
                   No.
 9.
                           Is this the document that was
        attached to the tweet that was reposted?
10 .
11.
                   Not that I recall.
12 .
                           Let's back it up Just
13 .
        back up one page.
14 .
                        see what the original -- the
15 .
        original PLO Department of Public Diplomacy and
16.
        Policy tweet says?
17 .
                   Yes.
                           Do you see it makes reference
18 .
19.
        to an official position?
20 .
                   Yes.
                   And the document that we -- or the
21 .
22 .
        page that we showed you a moment ago, is that a
23 .
        copy of the official position that the PLO
24 .
        Department of Public Diplomacy and Policy
25 .
        released along with this tweet?
```

```
1.
                   It looks like it was down to me.
        There is nothing written in it other than
        something in Arabic and it was just one word.
 4 .
                        Let's go to the next page. I
        think there was probably some text at the
        bottom that you were having difficulty seeing.
 7.
             .. Oh, I can't -- there's no way I can
        read that.
 9.
                 Let's zoom in a little There
10 .
        we
                Is that better?
11.
                   Yes, it's
                                       I mean, I'm not
        going to read all of It's going to waste
12 .
        everyone's
13 .
                                 What is the question?
              .. So the question is, is that the
14 .
15 .
        position statement that was attached to the PLO
16.
        Department of Public Diplomacy -- I'm sorry,
17 .
        Public Diplomacy and Policy that was attached
        to the tweet that the Observer Mission
18 .
19.
        retweeted?
20 .
                   It appears so, if it is attached to
21 .
        it.
22 .
                        MR. SINAIKO: Let's go to Tab
        20, and we will mark that as Exhibit 7.
23 .
24 .
                         (Deposition Exhibit No. 7 was
25 .
        marked for identification.)
```

BY MR. SINAIKO: And do you recognize this to be another tweet that was posted to the Observer Mission's Twitter feed? I retweeted it, but yes. Well, I mean, I guess it's a Do you recognize this to be a tweet that you posted to the Observer Mission's Twitter account? Yes. Okay. Yes. And you see that this document has the hashtag LandsDay? Yes. Is the hashtag LandsDay one of those hashtags that's designed to maximize the dissemination of the message in the tweet? That particular context, I am not sure if I was trying to maximize it or just commemorate the day. In general, though -- well, withdrawn. in this tweet, you are actually

10 .

11 .

12.

13 .

14 .

15 ·

16.

17 .

18 .

19.

20 .

21 .

22.

23 .

24 .

25 .

retweeting -- well,

Let me try this

question one more time. is actually a retweet of a tweet that was posted by another organization within the Palestine Liberation Organization; correct? 6. Yes, the Negotiation Affairs Department, yes. 8. And the purpose of this tweet was to disseminate publicly the Observer 10 . Mission's view and the view of the PLO that 11 . Israel was engaged in violations against the land and people of Palestine; is that correct? 12. 13 . MR. Object to the 14 . form of the question. 15 . BY MR. SINAIKO: 16. You may answer. 17 . The purpose of this tweet is to 18 . highlight the violations that the United 19. Nations continuously addresses against the 20 . people of Palestine and those that are 21 . illegally occupied. 22 . violations are deemed by --23 . against many international human rights groups, 24 . international human rights law, so these are 25 . violations not just by Palestinian Missions to

the United Nations, but violations that are also discussed at the United Nations. 3. But the purpose of the tweet is, just to cut through it, one of the purposes of the tweet, at least, is to publicize these these violations; correct? Object to the form of the Asked and answered. BY MR. SINAIKO: 10 . Do you need the You may 11 . question back? The purpose of the tweet is to, 12 . 13 . once again, highlight the illegal violations, 14 . as noted in the United Nations, that are 15 . conducted against a people that are occupied. 16. This is something that is legally embedded in 17 . the charter of the United 18 . once again, I am doing my work as the advisor to the Permanent Observer Mission of the State 19. 20 . of Palestine to the United Nations to educate 21 . people on violations that are deemed illegal by 22 . the United Nations. 23 . Understood. 24 . MR. SINAIKO: Let's go 25 . This is going to be Tab 22. to our next

```
I think we'll mark it as Exhibit 7; is that
        right?
                         THE COURT
                                               Exhibit
 4 .
        8.
                         MR. SINAIKO: Exhibit 8,
        sorry.
                         (Deposition Exhibit No. 8 was
        marked for identification.)
        BY MR. SINAIKO:
                   Oh, I'm so sorry, I meant to put up
10 .
11 .
        Tab 21. And, actually, before we do that, let
12.
        me just go back to -- let me go back to -- let
13 .
        me go back to Tab 19. That's Exhibit 6. Yeah.
14 .
        Let's just go back to that for one moment.
15 .
                       this tweet here, you see at the
16.
        -- you see underneath the tweet, it's dated
17 .
        1:59 p.m. -- do you have Exhibit 6 in front of
                             I can't hear you, ma'am.
18 .
        you on the
19.
                        Ghannam, can you hear
20 .
        having difficulty hearing anything right now.
21 .
                         THE COURT
                                               I cannot
22 .
        hear her either.
23 .
                         MR. SINAIKO: I think we have
        lost the audio.
24 .
25 .
                         THE VIDEOGRAPHER:
                                                    you
```

```
like to go off the record?
                        MR. SINAIKO: Well, we need to
                                I mean, whatever we
        get the audio
        have to If we have to go off the record to
        get the audio working, then fine.
 6.
                        THE VIDEOGRAPHER:.
                                                   We
                                The time is 17:24 UTC
        are now off the
        time.
                        (Discussion held off the
10 .
        record.)
                        THE VIDEOGRAPHER:. are
11 .
12.
       back on the The time is 17:26 UTC
13 .
       time.
        BY MR. SINAIKO:
14 .
15 .
               . Ms. Ghannam, we are back on the
16.
                 Can you see that I have put Exhibit 6,
17 .
        Deposition Exhibit 6 back on the screen in
18 .
        front of you?
19.
              .. Yes, I can see it.
20 .
                  And this is the retweet that we were
21 .
        talking about a moment ago; correct?
22.
              .. Correct.
23 ·
                         And if you look at the bottom
24 .
        of the tweet, you will see that it says, 1:59
25 .
        p.m., February 4, 2020. Do you see that?
```

Yes. Would you agree that this was a tweet that was posted at 1:59 p.m. on the 4th of February 2020? 5. Yes. And would you agree that this is a tweet that you posted from the UN -withdrawn. you agree that this is a post 10 . that -- to Twitter that you made from the Observer Mission building at 115 East 65th 11 . 12. Street in Manhattan at the date and time noted 13 . on the tweet? Most likely, yes, unless I wasn't 14 . 15 . tweeting from my lunch break because it's close to 2:00. 16. 17 . But you would say most likely, just 18 . to be clear, you would say most likely --19. Yes. 20 . -- you tweeted that from inside the 21 . Observer Mission building at 115 East 65th 22 . Street in Manhattan? 23 . Most likely, yes. 24 . Let's go back to tab, I think we 25 · said Tab 21, and we're marking that as Exhibit

```
1 .
        8.
                         MR. SINAIKO: Karen, did you
        get that?
                         THE COURT
                                               Yes.
        Exhibit 8, yes.
                         MR. SINAIKO:
                                               Let's put
        up Tab 21. That will be Exhibit 8.
        BY MR. SINAIKO:
 9.
                         And Ms. Ghannam, do you
                   All
10 .
        see Exhibit 8 in front of you?
11 .
                   Yes.
12.
                   Do we agree that this is another
13 .
        tweet that you posted to the Observer Mission's
        Twitter account?
14 .
15 ·
                   Yes.
16.
                   Do we agree that this is a tweet
        that you posted at 9:00 a.m., on April 12,
17 .
18 .
        2020, as stated at the bottom of the tweet?
19.
                   Yes.
20 .
                   And this is actually a retweet; is
21 .
        that right?
22 .
                   Yes.
23 .
                   And you were retweeting on behalf of
        the Observer Mission, to the Observer Mission's
24 .
25 .
        Twitter account, a tweet that had originally
```

been posted by the PLO Department of Public Diplomacy and Policy; correct? 3. Yes. 4 . And this is another communication by the PLO relating to annexation of land in the West Bank; is that correct? Object to the form of the question. BY MR. SINAIKO: 10 . You may answer. 11 . I can't read all of It appears 12. it, but I believe it was a statement put out by 13 . Dr. Ashrawi regarding annexation. 14 . And that was something that 15 . you felt the Observer Mission should 16. disseminate on Twitter; correct? 17 . Annexation is one of 18 . the biggest illegal moves that speaks against 19. everything that you can possibly read in the UN 20 . charter regarding the illegal occupation of the 21 . State of Palestine. 22. Would it be fair to say that you 23 . felt it was important to raise public awareness on this issue by making this Twitter post? 24 . 25 . Yes.

```
Let's go to Tab
                         MR.
        22, which we are going to mark as Exhibit 9.
                         (Deposition Exhibit No. 9 was
        marked for identification.)
        BY MR. SINAIKO:
                    And Ms. Ghannam, do you have Exhibit
        9 in front of you?
 8.
                    I do.
 9.
                    And do you recognize this to be a
10 .
        retweet that you made to the Observer Mission's
11 .
        Twitter account on April 28, 2020, at 6:30
12.
        p.m.?
13 .
                    Yes.
14 .
                           And do you recognize this
15 .
        also to be a retweet?
16.
                    Yes.
17 .
                    And what is it a retweet of?
18 .
                    It was posted by the Institute of
19.
        Middle East Understanding on, once again,
20 .
        illegal settlements on Palestinian land that
21 .
        the United Nations opposes, and there's several
22 .
        resolutions that oppose it and it is deemed
23 .
        illegal.
24 .
                                I felt it was extremely
25 .
        important, on behalf of our Mission to the
```

```
United Nations, to continue working under the
        mandate of the UN by elevating the illegal
        issue of settlement expansion.
 4.
                    When you say elevating the illegal
        issue of expansion, you mean raising public
        awareness on that topic by disseminating --
 7.
                  Correct.
 8 .
                    To bring attention?
 9.
                    Correct.
10 .
                         MR. SINAIKO:
                                               Let's go
11 .
        to Tab 23, and I think we are on Exhibit 10.
12 .
                         (Deposition Exhibit No. 10 was
        marked for identification.)
13 .
14 .
        BY MR. SINAIKO:
15 .
                    Ms. Ghannam, can you see Deposition
16.
        Exhibit 10 on the screen in front of you?
17 .
                    Not yet.
                    I think we may be having another
18 .
                             It looks like the video is
19.
        technical
20 .
                  Can you hear me?
21 .
                    I can hear you, yes.
              .. Can you see Exhibit 10 on the screen
22 .
        in front of you?
23 ·
24 .
                    No.
                         MR.
                                        Okay
                                               We
25 .
```

definitely are having a technical problem because I, in my Zoom, I can see Exhibit 10 on the screen in front of me, but I think Ms. Ghannam is unable to see And we need to resolve that. Let me see if I MR. can show her on my laptop, if that will solve the problem. THE Yes, I can see this. MR. SINAIKO: Great. Actually, mine is working Okay. BY MR. SINAIKO: Do you recognize this to be a tweet that you posted to the Observer Mission's Twitter account? Yes. And when did you make this Twitter post? It looks like May 11 at 3:03 p.m. Do you know where you were -- I mean, do you know where you were physically located at the time you made this Twitter post? May 11th, I was in Washington. And the purpose of this

10 .

11 .

12 .

13 .

14 .

15 .

16.

17 .

18 .

19 .

20 .

21 .

22 .

23 .

24 .

25 .

```
Twitter post was to raise public awareness of
        Israeli annexation threat; is that correct?
 3.
                    Yes.
                         MR. SINAIKO: Let's go to Tab
        40. That will be Exhibit 11.
                         (Deposition Exhibit No. 11 was
        marked for identification.)
        BY MR. SINAIKO:
                    Ms. Ghannam, can you see Deposition
 9 .
10 .
        Exhibit 11 in front of you?
11 .
                    Yes.
                    And can you tell me what you
12 .
13 .
        recognize that document to be, if anything?
                          I believe it speaks to the
14 .
15 .
        illegal annexation policy by the occupying
16.
        Tala (phonetic).
17 .
                      And, more generally,
18 .
        recognize this to be a Twitter post on the
19.
        Observer Mission's Twitter feed; correct?
20 .
                    That is correct.
                    And it's actually another retweet;
21 .
22 .
        is that right?
23 .
                    That is correct.
24 .
                    And what is it a retweet of?
25 .
                    It discusses 18 Senate Democrats, I
```

tagged them, expressing their concern regarding unilateral annexation of Palestinian territory. And who made the original post? It looks like oh, the original post, excuse me, the PLO Department of Public Diplomacy and Policy. And that's an entity that is part of one of the Defendants in this case; 9 · correct? Public Diplomacy and Policy is 10 . 11 . an extension of the type of work that the PLO 12. does, I I don't know whether or not 13 . they are Defendants in this case or not, to be 14 . quite frank with I just know from a media 15 . standpoint, without --16. Let me put the question again. 17 . you understand that the PLO 18 . Department of Public Diplomacy and Policy is 19. part of the Palestine Liberation Organization, one of the Defendants in this case? 20 . 21 . Objection, calls 22 . for a legal conclusion, but you can answer 23 . again. 24 . THE They are part of 25 . the PLO, yes.

BY MR. SINAIKO: And you posted this -- well, withdrawn. it correct that you retweeted, on the Observer Mission's Twitter account, the original Twitter posts from the PLO Department of Public Diplomacy and Policy to call attention to the fact that members of the United States Congress had expressed concerns 10 . about annexation? 11 . Because the United Nations is 12. encompassing, the United States is part of the 13 . United Therefore, it becomes another 14 . issue, when we talk about unilateral annexation 15 . of Palestinian territory, the United States is 16. Hence, this falls within a member of the 17 . the frame of my work. 18 . am doing work on behalf of the 19. United Nations since the U.S. is a member of the UN. 20 . 21 . MR. SINAIKO: All right. 22 . Let's go to Tab 41. I think this is going to be 12. So let's mark the next document that 23 .

(Deposition Exhibit No. 12 was

pops up as Exhibit 12.

24 .

25 .

```
marked for identification.)
        BY MR. SINAIKO:
 3.
                    And Ms. Ghannam, can you see Exhibit
        12 in front of you?
 5.
                    Yes.
 6.
                    And what do you recognize that to
        be?
 8.
                    A tweet, it looks -- just a tweet
        regarding, it's watch now, which looks like
10 .
        it's a video.
11 .
                            So this is a Twitter post
12.
        that you put on the Observer Mission's Twitter
        feed on July 29 of 2020; correct?
13 .
14 .
                    Correct.
15 .
                    And the purpose of this Twitter was
16.
        to encourage the public to watch the video that
        was attached to the tweet; is that right?
17 .
18 .
                    Correct.
                    And the video was prepared by the
19.
20 .
        PLO Department of Public Diplomacy and Policy;
21 .
        correct?
22.
                    It was prepared by them to highlight
23 .
        the illegal annexation and the illegal
24 .
        occupation of Palestinian territory, which are
25 .
        considered crimes against humanity by the
```

United Nations, correct. So the question was, this was -- the question was, this is a video that was prepared by the PLO Department of Public Diplomacy and Policy; correct? Correct. Let's MR. mark -- let's put up Tab 24, which we will mark as Exhibit 13. (Deposition Exhibit No. 13 was marked for identification.) BY MR. SINAIKO: Ms. Ghannam, do you have Exhibit 13 in front of you? I do see it, yes. And what do you recognize this document to be? It's something written against the illegal use of administrative detention, Palestinian prisoners. So let me just ask the question in a little bit more focused Do you recognize this to be a tweet that you posted to the Observer Mission's Twitter feed? Yes.

10 .

11.

12.

13 .

14 .

15 .

16.

17 .

18 .

19.

20 .

21 .

22 .

23 .

24 .

25 .

```
1.
                   And when did you make this post to
        the Observer Mission's Twitter feed?
 3.
                   It looks like October 6, 2020, at
        1:00 p.m.
 5.
             .. And this was also a retweet; is that
        right?
 7.
                   Yes.
 8.
                   And it was a retweet of a tweet
        originally posted by the PLO Department of
10 .
        Public Diplomacy and Policy; correct?
11.
                   Yes.
12.
                           And the topic of this -- the
13 .
        topic of this tweet was administrative
14 .
        detention; is that right?
15 .
                          Illegal administrative
16.
        detention, correct.
17 .
                                 And the purpose of this
18 .
        tweet was to elevate public awareness of
19.
        illegal -- pardon me -- administrative
20 .
        detention; is that correct?
21 .
                   Yes.
                   That was --
22 .
                                        Okay.
23 .
                          Because many people don't
        understand what administrative detention is.
24 .
25 .
                   Understood.
```

```
MR. SINAIKO: So let's go to
        Tab 25, which we will mark as Exhibit 14.
                         (Deposition Exhibit No. 14 was
        marked for identification.)
        BY MR. SINAIKO:
 6.
                   Ms. Ghannam, can you see Exhibit 14
        in front of you?
 8.
                    Most of Your face and my face
        block off the right side of it.
                   Let's fix it so that you can see --
10 .
11 .
        I want to do whatever -- can you see it better
12 .
        now?
                   That works.
13 .
                   All righty. So can you see the
14 .
15 .
        document now?
16.
                   Yes.
17 .
                   And can you tell me whether that's a
18 .
        tweet that you posted to the Observer Mission's
19.
        Twitter feed?
20 .
                   Yes.
21 .
                   And when did you make this posting
22 .
        to the Observer Mission's Twitter feed?
23 .
                   November 28, 2020, at 2:27 p.m.
                   By any chance, do you know where you
24 .
        were located physically when you made that
25 .
```

```
posting?
                    Thanksgiving, that first year, after
        COVID -- I believe we were in Washington.
                   But you weren't in the Observer
        Mission building?
                   No.
                           And the purpose of -- would
        it be fair to say that the purpose of this
        tweet was to call public attention to a letter
10 .
        that Dr. Mansour wrote to a UN official?
                    Well, I can't see the original
11 .
12.
        letter, but either Dr. Riyad would have written
        it or Ambassador Feda would have written it, if
13 .
14 .
        Dr. Riyad was out of town.
15 .
                   Let's go to the attachment because
16.
        that's part of the exhibit.
17 .
                   Okay.
                   Let me just ask the question again.
18 .
        Do you see that the document referenced in the
19.
20 .
        Twitter post is a letter that
21 .
                   A letter by
22 .
                   I'm sorry?
23 .
                    You would have to scroll all the way
24 .
        to the bottom to see who it was written by.
25 .
                            Let's do that so you get
```

```
to see it.
                   Go up a little more, please. I
        don't know who drafted
                                    It was either
        Ambassador Feda or Dr. But most
        likely --
                  Let's go down to the bottom of the
                           You will see that it
        letter for just a
        appears to be signed by Dr. Khalil El-Halabi.
        Do you see that?
10 .
                   Yes.
                   Do you understand this to be a
11 .
12 .
        letter that Dr. Khalil El-Halabi wrote to a UN
13 .
        official or to -- or perhaps to, you know,
14 .
        Ambassador Mansour?
15 .
                   It could be -- it could have been
        that he was quoted in the I didn't
16.
17 .
        write the
                        I just posted it.
                          The purpose of the Twitter
18 .
19.
        post was to disseminate this letter publicly to
20 .
        draw attention to the issue -- raise public
21 .
        attention to the issue raised in the letter;
22 .
        correct?
23 .
                   Yes.
24 .
                        MR. SINAIKO: Let's go to Tab
25 .
        26, which we will mark as Exhibit 15.
```

```
(Deposition Exhibit No. 15 was
marked for identification.)
BY MR. SINAIKO:
           Ms. Ghannam, do you have Exhibit 15
in front of you?
           I do.
           Do you recognize this to be another
post that you put on the Observer Mission's
Twitter feed?
           Yes.
           And when did you put this post on
the Observer Mission's Twitter feed?
           January 11, 2021 at 9:16 a.m.
           And it says, on the top of the first
line, statement by PMOFA. Do you see that?
           Yes.
           What is PMOFA?
           The Palestinian Ministry of Foreign
Affairs.
           So this was a tweet by which the
Observer Mission was disseminating a message
created by the Ministry of Foreign Affairs;
correct?
           This is correct.
           And the Ministry of Foreign Affairs,
```

10 .

11 .

12.

13 .

14 .

15 .

16.

17 .

18 .

19.

20 .

21 .

22 .

23 .

24 .

25 .

that is -- or the statement by the Ministry of Foreign Affairs, pardon me, is that the document attached at the bottom of the tweet? 4 . I believe -- I believe it's actually a media brief drafted by NAD, the Negotiation Affairs Department. 7. And it's the PLO -- that's the Palestine Liberation Organization Negotiation Affairs Department; correct? 10 . Yes. 11. And is that part of the Ministry of 12 . Foreign Affairs? No. 13 . What is the connection between the 14 . 15 . Negotiation Affairs Department and the Ministry of Foreign Affairs, if any? 16. 17 . I don't know the exact legal 18· connection between the My specialty is 19. not in that realm of work. 20 . work was to just disseminate the information as it pertains to the illegality of 21 . 22 . the State of Israel's illegal occupation of Palestinians as a violation of Fourth Geneva 23 . Convention, as a violation of the UN mandate, 24 . as a violation of the UN charter, that they 25 .

have to take full responsibility of its citizens of the occupying -- the occupying power has to take full responsibility of the citizens it is occupying; hence, the reason for the information regarding the lack of COVID vaccinations to the occupied people. 7. So the purpose of this post was to elevate public awareness of the issue that was being raised in this paper prepared by 10 . the Palestine Liberation Organization Negotiation Affairs Department; is that 11 . 12 · correct? 13 . Objection, asked 14 . You may answer and You may 15 . answer again. 16. THE Yes, because, 17 . again, if you note, at the end, I write the 18 . full statement below at UN, which means I publicly retweet back to the United Nations 19. that what I am stating is a complete violation 20 . 21 . of the UN mandate, of the UN charter. 22 . therefore, it is the occupying 23 . power's obligation to administer vaccines, 24 . vaccinations to the occupyees, so they are in violation of international law and it is 25 .

```
illegal what they are doing to the occupied
        people of Palestine.
        BY MR. SINAIKO:
 4 .
                    So would it be fair to say that the
        purpose of this tweet is to draw to public
        attention conduct that the Observer Mission
        regards as a violation of UN requirements?
 8.
                   Yes.
                         MR. SINAIKO:
                                               Let's go
        to Tab 27. That will be Exhibit 16.
10 .
11 .
                         (Deposition Exhibit No. 16 was
12 .
        marked for identification.)
13 .
        BY MR. SINAIKO:
14 .
                   And Ms. Ghannam, can you see Exhibit
15 .
             I think the video might be frozen again so
16.
        I'm not sure you can see it.
17 .
                    Not yet.
18 .
                         MR. SINAIKO: Let's give it a
19.
        moment and if it doesn't -- if it doesn't pop
20 .
        up, Mitch, maybe we can show her the document
21 .
        on your laptop.
22 .
                         MR.
                                       It's popping up.
23 .
                         THE
                                               Yes, I
24 .
        remember this.
25 .
        BY MR. SINAIKO:
```

```
1.
                    Maybe you can start by telling us,
        in a high level way, whether this is yet
        another tweet that you posted to the Observer
        Mission's Twitter account?
 5.
                    Yes, I did.
 6.
                           And this was done on February
        14, 2021; correct?
                    Correct.
                           And what exactly was this
10 .
        Twitter, tweet -- let me withdraw that.
11 .
                         exactly was this tweet
12 .
        disseminating?
13 .
                    Why was it disseminated; is that
14 .
        your question?
15 ·
                    I was asking what was being
16.
        disseminated through this tweet.
                         It was stories of the
17 .
18 .
        illegality of the Israeli citizenship law which
19.
        forces citizens to stay away from each other
20 .
        because of the illegal occupation.
21 .
                           And the purpose of this tweet
22 .
        was to draw public attention to an Israeli law
23 .
        that the Observer Mission --
24 .
                    An illegal Israeli law --
25 .
                    Let me finish the
                                                   Am I
```

```
correct that the purpose of this tweet was to
        draw attention to an Israeli law that the
        Observer Mission regarded as inconsistent with
        UN mandates?
 5.
                   Yes.
                         MR. SINAIKO:
                                               Let's go
        to Tab 28, which we will mark as Exhibit 17.
                         (Deposition Exhibit No. 17 was
        marked for identification.)
10 .
        BY MR. SINAIKO:
11 .
                   All
                         Ms. Ghannam, are you
12 .
        able to see Exhibit 17?
13 .
                   Not yet.
14 .
                           Would you let me know when it
15 .
        pops up?
16.
                   Okay.
17 .
                   This is so much easier in person, I
18 .
        have to tell you.
19.
                                       I've got it on my
20 .
        laptop, so let me show it to
                                           Can you see
21 .
        it from
                        There you
                                       It's on the big
22 .
        screen now.
23 .
                         THE
                                        Okay.
24 .
        BY MR. SINAIKO:
25 .
                    Do you recognize this to be another
```

```
tweet that you posted to the Observer Mission's
        Twitter account?
 3.
                    Yes.
 4 .
                    And it's a tweet that you posted on
        May 11; correct?
 6.
                    Yes.
 7.
                    And this is a tweet -- what was the
        nature of this
                                Maybe you can tell us
                I'll try to ask it in a more open-ended
10 .
        way.
11 .
                           So a Mark Ruffalo, which many
        of you know is a celebrity, used his platform
12.
13 .
        to expose the illegality of the potential
        expulsion of 1500 Palestinians from occupied
14 .
15 .
        Jerusalem.
                    And in this tweet, the Observer
16.
17·
        Mission thanked Mr. Ruffalo for making his
18 .
        post; is that correct?
19.
                    Yes, I did.
20 .
                           Let's go to the next page of
21 .
                    Is that Mr. Ruffalo's post that you
22 .
        were forwarding?
23 .
                    I believe I was retweeting it, yes.
24 .
                           And you see that
25 .
        Mr. Ruffalo's post, in turn, attached a
```

```
document?
                              Would you mind going back
        for a second, because I think --
                  Not at all.
                   -- I might have just retweeted.
               I'm sorry, go
                              Uh-huh.
                   Do you see that Mr. Ruffalo's tweet
        that the Observer Mission retweeted to its own
        Twitter account, in turn, attached the
10 .
        document?
11 .
                   I may not have noticed it at the
12 .
               I don't recall right There was a
13 .
        lot going on during this time period.
                                But you see that there
14 .
15·
        is a document attached to Mr. Ruffalo's tweet;
16.
        correct?
17 .
                   I do see that.
              .. And do you understand what that
18 .
19.
        document is?
                   You'd have to open it for me to look
20 .
                I don't recall.
21 .
        at
22.
                   Let's go to the next page.
23 .
                Okay.
                   Do you understand what that might
24 .
25 .
        be?
```

	No.
	Do you want to do you need
	maybe we should show her the rest of the pages
4 ·	of it.
	Assuming it's some sort of petition.
	So Mr. Ruffalo's
	tweet well, Mr. Ruffalo's tweet attached a
	petition that members of the public could sign
	relating to this topic; correct?
10 ·	It appears so.
11.	And the Observer Mission retweeted
12 ·	Mr. Ruffalo's tweet to bring Mr. Ruffalo's
13 ·	tweet to the attention of a broader audience;
14 ·	correct?
15 ·	Yes.
16 ·	MR. SINAIKO: Let's go
17 ·	to Tab 29, which will be Exhibit 18.
18 ·	(Deposition Exhibit No. 18 was
19 ·	marked for identification.)
20 ·	BY MR. SINAIKO:
21 ·	. We're going to be on Tab 29.
22 ·	That will be Exhibit 18.
23 ·	Ghannam, if you can just let me
24 ·	know when you are able to see that.
25 ·	I'll show it to

```
her on my laptop.
                         MR. SINAIKO: I've got to say,
        I can't wait until we're able to do these
        things in person This is just
        incredibly painful.
 6 .
                         MR.
                                       She's got it on
        my laptop for now, until it pops up on the big
        screen.
        BY MR. SINAIKO:
10 .
                    So Ms. Ghannam, can you see
11 .
        Deposition Exhibit 18 now?
12.
                    Yes.
13 .
                   And this is another tweet that you
14 .
        posted to the Observer Mission's Twitter
15 .
        account; is that correct?
16.
                    Yes.
17 .
                    And you made that post on May 15,
18·
        2021; is that correct?
19.
                    Yes.
20 .
                    There, now you can see it on the big
21 .
                 Once your video pops up, I know you
22 .
        can see it.
23 .
                       you've got it on the screen in
24 .
        front of you now?
25 .
                    Yes.
```

1. Was this -- I see that this one, this tweet actually has the SaveSheikhJarrah hashtag; do you see that? 4 . Yes. 5. Would it be fair to say that part of the purpose of that hashtag was to magnify the attention, the public attention that this Twitter posting would receive? 9. Yes. 10 . And the purpose of this --11 . It looks like well, what was the 12. there's a document attached to this tweet, is 13 . that right, or maybe this is retweeting? 14 . Retweeting, from what I can recall. 15 . I don't know if that's a video or just a 16. If I have to guess, it's just a 17 . picture because what happened is that the 18 . occupying power indiscriminately and illegally 19. bombed and destroyed the offices of the Associated Press and Al Jazeera Arabic in Gaza 20 . 21 . and, therefore, the occupied region of Gaza was 22 . cut off from the rest of the world, so we had 23 . to rely on tweets coming out from the region to 24 . show the world what was happening illegally 25 . there.

1. So would it be fair to say that the purpose of this tweet was to call public attention to the Observer Mission's view that Israel had indiscriminately and illegally bombed and destroyed the offices of the Associated Press in Al Jazeera? 7. The purpose of this tweet is to highlight the view of the State of Palestine and the United Nations in terms of the 10 . illegality of what Israel was doing in terms of 11 . conducting potential war crimes against nearly 12 . two million people who are subjected to an 13 . illegal blockade of nearly 14 years, which is 14 . deemed illegal by the United Nations, yes. 15 . of this falls within my 16. framework at the UN because all of these issues 17 . and everything that you have asked me thus far 18 . are things that the UN discusses regularly as 19. illegal and against the UN charter and the UN 20 . framework. 21 . I notice I notice, Ms. Ghannam, 22 . that the first line of this tweet references 23 . @POTUS. Do you see that? 24 . Yes, the President of the United 25 . States.

1. And why would this tweet make reference to the President of the United States? 4 . Because the United States of America is a permanent member of the UN Security Council, and the United States, as a permanent member of the Security Council, regularly votes against any and all resolutions that speak against the illegal occupation of the State of 10 . Palestine. 11 . while the whole world watches 12 . this indiscriminate bombing of this illegal 13 . occupation, the United States happens to be the 14 . only member of the Security Council that cannot 15 . publicly make a statement saying that this is 16. wrong. And you wanted to -- is it true, 17 . 18 . Ms. Ghannam, would it be fair to say, 19. Ms. Ghannam, that one of the purposes of this 20 . tweet was to raise awareness of the positions 21 . that the Trump administration was taking within 22 . the United States? 23 . My purpose was to bring forth the 24 . policies that the United Nations as a voting 25 . member of the -- excuse me, the United States,

as a voting member of the United Nations and as a permanent member of the United Nations

Security Council and their extremely important role at the United Nations, and how are they able to sit back and take a side seat to an issue distressing to many people around the world, an issue that's illegal.

· Was part of the purpose of this tweet to raise awareness among the American public of the position that its government was taking?

12 · Objection, asked

and You may answer again.

14 · BY MR. SINAIKO:

8.

10 .

11 .

13 .

15 .

16.

17 .

18 .

19.

20 .

21 .

22 .

 $23 \cdot$

24 .

25 .

You may answer.

The objection was to raise awareness that the United States of America, which is a voting member of the Security Council of the United Nations, and a permanent member of the United Nations security member, and the fact that all work conducted in the region, gets the blessing of the United States, through the United Nations, and, therefore, the fact that the United States of America is unable to make a public statement regarding something where

	the majority of the world was able to demonize
	in one way or another was perplexing, yes.
3.	Just going to try one more
	The objective was to raise that
	awareness among the American public; is that
	correct?
	It's
	not only asked and answered, but the reason why
	you keep coming back is that it's
10 ·	So I object to the
11 ·	argumentative questioning of this witness.
12 ·	MR. SINAIKO: She can answer
13 ·	the question.
14 ·	MR. Do you have
15 ·	anything to add to your previous answer?
16.	THE No.
17 ·	MR. SINAIKO: She can answer
18 ·	the question that I ask, not the questions that
19 ·	you ask, Mr. Berger.
20 ·	You've asked this
21 ·	question three It's argumentative,
22 ·	asked and You may answer it again.
23 ·	MR. SINAIKO: I would like the
24 ·	question read back please, Karen.
25 ·	(Reporter read back from the

```
record.)
                         THE
                                        No.
                         MR. SINAIKO: Let's mark as
        our next exhibit Tab 30. I think this will be
        Exhibit 19.
                         (Deposition Exhibit No. 19 was
        marked for identification.)
        BY MR. SINAIKO:
                   Ms. Ghannam, can you see Exhibit 19
 9 .
10 .
        in front of you?
11 .
                   Yes.
12.
                           And you recognize what do
13 .
        you recognize this to be, if anything?
14 .
                    I recognize this very
15·
        a mother and a child who were stuck under the
16.
        rubble of their house after it being illegally
17 .
        shelled and begging for help so that they were
18 .
        not to die.
19.
                   This was a Twitter post that was put
        on -- that you put on the Observer Mission's
20 .
        Twitter feed; correct?
21 .
22.
                   Absolutely correct.
23 .
                   And the topic was the one that you
24 .
        just mentioned; correct?
25 .
                    Yes.
```

```
1.
                    And the purpose of this Twitter feed
        was to raise public awareness about the conduct
        that is described in this Twitter post and the
        Observer Mission's position with respect to
        that conduct; correct?
 6.
                    Yes.
                         MR. SINAIKO:
                                               Let's go
        to Tab 31, which we will mark as Exhibit 20.
                         (Deposition Exhibit No. 20 was
10 .
        marked for identification.)
11 .
        BY MR. SINAIKO:
12.
                   Do you see Deposition Exhibit 20 on
13 .
        the screen?
14 .
                        Yes, now I do.
15 .
                   And do you recognize that to be
16.
        another tweet that you posted to the Observer
17 .
        Mission's Twitter account on May 17, 2021?
18 .
                    Yes.
19.
                           And do you see that this
20 .
        Twitter post makes reference to AOC?
21 .
                    Yes.
22 .
                    Who is that?
                    Alexandria Ortez -- I always forget
23 .
24 .
        her
                   The representative from New York.
                            Alexandria Ocasio-Cortez; is
25 .
```

that right? Yes. And what about Bush? Cori Bush. And what about John Oliver. Uh-huh, who else? 8. Ali Velshi, and then Reid, I forget his first name, yes. 10 . And what information was this 11 . Twitter post conveying? 12. That the use of the word "apartheid" 13 . is not so illegal, it's not deemed as taboo 14 . anymore. 15· And the purpose of -- the 16. purpose of this, is it correct that the purpose 17 . of this tweet was to disseminate publicly the 18 . Observer Mission's view that the State of 19. Israel engages in apartheid? 20 . The purpose of this tweet is to 21 . share information that is left up to the 22 . general public to decipher in any way possible 23 . that they see fit in terms of the illegalities of what is happening to the people of Palestine 24 . that is repeatedly discussed and repeated at 25 .

```
the United Nations.
                       is not up to me to decide what
        people take from what I post.
                         MR. SINAIKO:
                                        Let's put
        up Tab 32 and let's mark that as our next
        exhibit, which will be Exhibit 21.
                         (Deposition Exhibit No. 21 was
        marked for identification.)
        BY MR. SINAIKO:
10 .
                   Ms. Ghannam, can you see Exhibit 21?
11 .
                   Not yet.
12 .
                                       Every time I show
13 .
        her my laptop, it pops on the video.
14 .
                         MR. SINAIKO: It's like
15 .
        clockwork.
16.
                         (Off-the-record discussion
17 ·
        held.)
18·
        BY MR. SINAIKO:
19.
                          Can you see the document now,
        Exhibit 21?
20 .
21 .
                  Yes.
22.
                   And that's another posting that you
        made to the Observer Mission's Twitter account?
23 ·
24 .
                   Yes.
25 .
                   And that was a retweet?
```

Yes. It was a retweet of a tweet that originally was put up by Senator Warren; 4 . correct? Yes. And do you think you retweeted Senator Warren's tweet the same day that Senator Warren put it up on her own feed? I can't tell you. 10 . In any event, the purpose -- is it 11 . correct that the purpose of this tweet was to 12. bring to the attention of the public Senator 13 . Warren's view that the Eiden administration 14 . should press for a just, lasting two-state 15 . agreement? 16. The purpose of this tweet is to 17 . press on the viewpoint that a lasting two-state 18 . agreement is needed to see a just and viable 19. peace in the region, something that the United 20 . Nations had been working towards for decades 21 . now and is the longest standing occupation and 22 . file at the United Nations. 23 . MR. SINAIKO: Let's go 24 . to Tab 33, which we will mark as Exhibit 22. 25 . (Deposition Exhibit No. 22 was

marked for identification.) MR. SINAIKO: And Mitch, if you could just put the laptop in front of her now so that this works more promptly this time. I don't MR. have it See, it worked instantly. MR. SINAIKO: Like magic. BY MR. SINAIKO: 9. Anyway, Ms. Ghannam, do you see Exhibit 22 in front of you? 10 . 11 . I do. 12. And do you recognize that to be a 13 . tweet that you posted to the Observer Mission's 14 . Twitter feed on May 24th of this year? 15. Yes. 16. And the purpose of this 17 . Yes, I recognize it. 18 . Is it correct that the purpose of 19. this Twitter feed was to bring to public attention criticism of the Eiden administration 20 . 21 . in an article that Newsweek had published? 22 . The purpose of this retweet was to 23 . bring attention to the fact that the United 24 . States, a permanent country of the Security 25 . Council who has the right to veto anything they

want in the Security Council, and a member of the larger UN General Assembly, has gone ahead and provided the State of Israel with smaller bombs to continue doing the work that they have done illegally. MR. SINAIKO: And let's mark, as Exhibit 23, a Twitter post dated July 9 of 2021. That will be Tab 34, Cosette. (Deposition Exhibit No. 23 was 10 . marked for identification.) 11 . BY MR. SINAIKO: 12. And Ms. Ghannam, do you 13 . recognize -- can you see Deposition Exhibit 23 in front of you now? 14 . 15 . Yes. And do you recognize that to be a 16. 17 . posting that you made to the Observer Mission's Twitter feed earlier this month? 18 . 19. Yes, I retweeted it. 20 . And this is a retweet from the PLO's Negotiation Affairs Division; is that 21 . 22 . right? 23 . Department, yes. 24 . I got the title -- I 25 . It's the Negotiation Affairs

```
Department?
                   That's Yes.
                          And this is another --
        another tweet, the purpose of which is to bring
        to public attention the Observer Mission's
        views about annexation of territory; is that
 7 .
        correct?
 8.
                   Particularly the annexation wall,
        yes.
10 .
                   Okay.
                   And the illegal settlement units
11 .
12 .
        that have been established in occupied illegal
        territories, And the number of civilian
13 .
14 .
        deaths as well.
15 .
                 Anything else?
16.
                        The tweet is pretty
17 .
        self-explanatory.
18 .
                        MR. SINAIKO: Excellent. We
19.
        can take that one If it's okay -- if
20 .
        it's okay with everybody, I like to just go off
21 .
        the record for five minutes.
22 .
                        MR.
                                      Yeah.
23 .
                        MR. SINAIKO: Good enough.
24 .
        Thanks.
25 .
                        THE VIDEOGRAPHER: are now
```

THESE PAGES HAVE BEEN INTENTIONALLY OMITTED